

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SIDNEY GORDON and JEFFREY
TAUBER,

Plaintiffs,

v.

SONAR CAPITAL MANAGEMENT LLC;
NEIL DRUKER; PRIMARY GLOBAL
RESEARCH, LLC; SONAR PARTNERS,
LP; SONAR INSTITUTIONAL FUND, LP;
SONAR OVERSEAS FUND, LTD.; Aurora
Hedged Equity LP; Aurora Hedged Equity
Offshore Fund, Ltd.; Aurora Limited
Partnership; Aurora Offshore Fund LTD. II.;
Azimuth Diversified Fund, LLC;
AZIMUTH SELECT FUND, LLC; Barfield
Nominees Limited A/C 18818; Chicago
Patriot, LLC; Continental Casualty
Company; David E. Semmel; Delos Fund,
Ltd; Delos Fund II, Ltd.; Dorel, LLC; FQR
Alternatives II, LP; Joanne Mackinnon;
Jocelyn Bowie; IFC (A) Trust; IFC (E)
Trust; Leslie Semmel; Loews Corporation;
MWV Employee Retirement Plan Group
Trust; The Orrington Fund, Ltd.; The
Orrington Fund, LP; The Orrington Plus
Master Fund, Ltd.; Pangaea Partners, LP;
Paros Fund Trust; Q-BLK Alpha Engine,
Ltd.; Q-BLK Equity Edge Portfolio, LP; Q-
BLK Equity Edge Portfolio, Ltd.; QIP Ltd.;
QPA Ltd.; Robeco-Sage Capital
International II, Ltd.; Robeco-Sage Capital,
LP; ARDEN Sage Multi-Strategy Fund,
LLC; ARDEN Sage Triton Fund, LLC;
Robeco-Sage Unit Trust; Semmel Family
Trust; Steinberg Family Investments, Ltd.;
The Weatherlow Fund, LP,

Defendants.

Case No. 11-CV-9665 (JSR)

JURY TRIAL DEMANDED

**NOTICE OF MOTION FOR CLASS CERTIFICATION, APPOINTMENT OF CLASS
REPRESENTATIVES, AND APPOINTMENT OF CLASS COUNSEL**

PLEASE TAKE NOTICE that Lead Plaintiffs Sidney Gordon and Jeffrey Tauber (“Lead Plaintiffs”) respectfully move this Court pursuant to FED. R. CIV. P. 23 for an order: (i) certifying the proposed Seller Class and Buyer Class (the “Classes”); (ii) appointing Lead Plaintiffs as representatives of the Classes; and (iii) appointing Brower Piven, A Professional Corporation, and Shapiro Haber & Urmey LLP as class counsel.

Any opposition papers shall be filed by February 13, 2015. Any reply papers shall be filed by February 20, 2015. The Motion shall be heard on March 3, 2015 at 3:00 PM by the Honorable Jed S. Rakoff. The Motion is based upon the accompanying Memorandum of Law in support thereof, the accompanying Declaration of Brian C. Kerr and the exhibits thereto, and other such matters and arguments as the Court may consider during the hearing of this Motion.

Dated January 23, 2015

Respectfully submitted,

BROWER PIVEN
A Professional Corporation

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